

WEIL, GOTSHAL & MANGES LLP  
Richard W. Slack (*pro hac vice*)  
(richard.slack@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
767 Fifth Avenue  
New York, NY 10153-0119  
Tel: (212) 310-8000  
Fax: (212) 310-8007

KELLER BENVENUTTI KIM LLP  
Jane Kim (#298192)  
(jkim@kbbkllp.com)  
David A. Taylor (#247433)  
(dtaylor@kbbkllp.com)  
Thomas B. Rupp (#278041)  
(trupp@kbbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: (415) 496-6723  
Fax: (650) 636-9251

*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ANGELA FERRANTE  
IN SUPPORT OF REORGANIZED  
DEBTORS' TWENTY-THIRD SECURITIES  
CLAIMS OMNIBUS OBJECTION  
(SECURITIES ACQUIRED OUTSIDE  
SUBJECT PERIOD)**

**Response Deadline:  
September 12, 2023, 4:00 p.m. (PT)**

**Hearing Information If Timely Response Made:**

Date: September 26, 2023

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Angela Ferrante, hereby declare that the following is true and correct to the best of my  
2 knowledge, information, and belief:

3 1. I am a Managing Director of Kroll Settlement Administration LLC, an affiliate of Kroll  
4 Restructuring Administration LLC (formerly known as Prime Clerk) (collectively for purposes of this  
5 Declaration, “**Kroll**”). In my current role as Managing Director, I am responsible for all business  
6 operations including but not limited to securities claims noticing and administration.

7 2. I am providing this Declaration in support of the *Reorganized Debtors’ Twenty-Third*  
8 *Securities Claims Omnibus Objection (Securities Acquired Outside Subject Period And Insufficient*  
9 *Trading Information)* (the “**Omnibus Objection**”),<sup>1</sup> filed contemporaneously herewith in the chapter 11  
10 cases (the “**Chapter 11 Cases**”) of PG&E Corporation and Pacific Gas and Electric Company, as debtors  
11 and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**,” as applicable).

12 3. Kroll has been asked by the Reorganized Debtors and their counsel to assist with  
13 reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed in the  
14 Chapter 11 cases. I have over 20 years of experience in class action, legal, and administrative fields. I  
15 have personally overseen the administration of some of the most complex class action, regulatory and  
16 bankruptcy administrations in the country.

17 4. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon  
18 my personal knowledge, the knowledge of other employees working under and alongside me on this  
19 matter, my discussions with the Reorganized Debtors’ personnel and the Reorganized Debtors’ various  
20 advisors and counsel, and my review of relevant documents and information. If called upon to testify, I  
21 would testify competently to the facts set forth in this Declaration. I am authorized to submit this  
22 Declaration on behalf of the Reorganized Debtors.

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26 <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in  
the Omnibus Objection.

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**Identification of Claims Subject to the Omnibus Objection**

5. Kroll has been asked by the Reorganized Debtors and their counsel to assist with reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed in the Chapter 11 Cases and identifying claims to be included in omnibus objections, including the Omnibus Objection. In furtherance thereof, our team has reviewed and established a database for these claims. The database contains information extracted from proofs of claim and submitted by claimants via an online portal, including, where such details were provided by the claimant, information regarding when such claimant purports to have acquired their position(s) in the Debtors’ debt and equity securities that form the basis of the claim.

6. Based on our review, we have identified certain claims based on the purchase or acquisition of PG&E securities where the holder of the claim did not allege in their proof of claim or otherwise report any transactions for the purchase or acquisition of the Debtors’ securities during the period from April 29, 2015 through November 15, 2018, inclusive.

7. Specifically, utilizing our proprietary software, we identified claims based on the purchase or acquisition of PG&E securities that were filed after the Initial Bar Date and did not reflect a purchase or acquisition between the dates of April 29, 2015 to November 15, 2018. These identified Claims are set forth on Exhibit 1 and Exhibit 2 to the Omnibus Objection, which was prepared by our team under my general supervision, and I am familiar with its contents and the process under which it was prepared.

[REMAINDER OF PAGE LEFT BLANK INTENTIONALLY]

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and  
2 correct to the best of my knowledge, information, and belief.

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4 Executed August 7, 2023 in New York.

5  
6 /s/ Angela Ferrante

7 Angela Ferrante  
8 Managing Director  
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